

1 DAVID C. SHONKA
Acting General Counsel
2 GREGORY A. ASHE
BRIAN S. SHULL
3 Federal Trade Commission
600 Pennsylvania Avenue NW
4 Washington, DC 20850
Telephone: 202-326-3719 (Ashe)
5 Telephone: 202 -326-3720 (Shull)
6 Facsimile: 202-326-3768
Email: gashe@ftc.gov, bshull@ftc.gov

7
8 DANIEL G. BOGDEN
United States Attorney
9 BLAINE T. WELSH
Assistant United States Attorney
10 Nevada Bar No. 4790
333 Las Vegas Blvd. South, Suite 5000
11 Las Vegas, Nevada 89101
Phone: (702) 388-6336
12 Facsimile: (702) 388-6787

13 Attorneys for Plaintiff

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15 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

16 **FEDERAL TRADE COMMISSION,**

17 Plaintiff,

18 v.

19 **SEQUOIA ONE, LLC, *et al.*,**

20 Defendants.
21
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Case No. 2:15-cv-01512-JCM-CWH

**PLAINTIFF'S APPLICATION
FOR ENTRY OF DEFAULT
AGAINST DEFENDANTS
SEQUOIA ONE, LLC AND GEN X
MARKETING GROUP, LLC**

23 TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
24 NEVADA:

25 Plaintiff Federal Trade Commission ("FTC") hereby requests, pursuant to Federal Rule of
26 Civil Procedure 55(a), that the Clerk of the Court for the District of Nevada enter default in this
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1 matter against Defendants Sequoia One, LLC and Gen X Marketing Group, LLC. The facts
2 supporting this application are set forth in the accompanying declaration of FTC Counsel.

3 Defendants Sequoia One, LLC and Gen X Marketing Group, LLC were served with a
4 summons and complaint in this action. (Dkt. Nos. 6, 7, 17, and 18.) Neither defendant has
5 answered nor filed a responsive pleading to the complaint, and the deadline to file such pleadings
6 has passed.

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8 Accordingly, the FTC requests that the Clerk of the Court enter default against
9 Defendants Sequoia One, LLC and Gen X Marketing Group, LLC. A proposed form has been
10 filed along with this application.

11 Dated: June 29, 2016

Respectfully submitted,

12 DAVID C. SHONKA
13 Acting General Counsel

14 /s/Gregory A. Ashe
15 GREGORY A. ASHE
16 BRIAN SHULL
17 Federal Trade Commission
18 600 Pennsylvania Avenue NW
19 Washington, DC 20850
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Telephone: (702) 388-6336
Facsimile: (702) 388-6787

26 Attorneys for Plaintiff
27 FEDERAL TRADE COMMISSION

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on June 29, 2016, true and correct copies of (1) **PLAINTIFF'S APPLICATION FOR ENTRY OF DEFAULT AGAINST DEFENDANTS SEQUOIA ONE, LLC AND GEN X MARKETING GROUP, LLC**, (2) **DECLARATION OF FTC COUNSEL IN SUPPORT OF APPLICATION FOR ENTRY OF DEFAULT BY THE CLERK AGAINST DEFENDANTS SEQUOIA ONE, LLC AND GEN X MARKETING GROUP, LLC**, and (3) **[proposed] ENTRY OF DEFAULT** were filed electronically with the United States District Court for the District of Nevada using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/Gregory A. Ashe
Attorney for Plaintiff Federal Trade Commission